

### **REMARKS/ARGUMENTS**

Prior to the entry of this Amendment, the application included claims 1-22 and claims 1-22 stand rejected. Claims 1 and 16 are amended. Claims 1-22 are pending for examination. No new matter is introduced by the Amendment. Claims 1, 6, 11, 16, 21 and 22 are independent claims. Reconsideration and withdrawal of the rejection is respectfully requested in view of the Amendment and following remarks.

#### ***Specification***

The amendment filed on 3 February 2009 is objected to under 35 U.S.C. 132(a) because it introduces new matter into the disclosure. Claims 1 and 16 are amended to delete “without entering into said POS device any card numbers corresponding to the n-1 cards”. Withdrawal of the rejection is respectfully requested.

#### ***35 U.S.C. §112 Rejection***

The Office Action has rejected claims 1 and 16 under 35 U.S.C. §112, first paragraph, because the specification does not enable any person skilled in the art to which it pertains, or with which it is most nearly connected, to use the invention commensurate in scope with these claims. Claims 1 and 16 are amended to delete “without entering into said POS device any card numbers corresponding to the n-1 cards”. Instead, claims 1 and 16 are amended to add “based on the first card number and the total card number”. Support for the Amendments may be found in the specification, paragraph [0033]. No new matter is believed to be introduced. Withdrawal of the rejection is respectfully requested.

#### ***35 U.S.C. §103(a) Rejection***

The Office Action has rejected claims 1-22 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 7,028,896 B2 to Goldstein et al. (“Goldstein”), and further in view of U.S. Patent No. 6,473,500 B1 to Risafi et al. (“Risafi”).

Claims 1-5

The Examiner asserts that Goldstein discloses that a retailer may easily identify and activate multiple cards at one time since the cards may be provided in contiguous sets of cards and/or in a known sequence. The Examiner suggests that as a result the retailer may retrieve an entire set of cards and activate all the cards at once without having to individually activate each card. The Examiner also asserts that Risafi discloses the batch activation of a set of cards at a merchant terminal (POS, ATM, etc). Therefore, it would have been obvious, at the time of the invention, to one of the ordinary skill to combine the well known features of Goldstein for producing and packing cards in bundles for activation as a set with well known features of Risafi for batch activation of cards at a merchant terminal with the motivation to achieve the combined predictable results that each have individually.

The rejections are respectfully traversed. Even when the teachings of Goldstein and Risafi are combined, the two references do not teach or suggest the batch activation process at POS as recited in claim 1. While they may fortuitously use similar terms, the actual activation processes are far different. For example, Goldstein focuses on how to produce bundles of cards and only briefly mentions that providing the cards in a specific sequence may allow **for easier inventory control of cards or "batch activation" of cards**. Goldstein describes, Col. 3, ll. 39-45), that to activate a smaller series of cards within a selected bundle, sleeve etc, the first and last cards in the series may be identified to the card tracking database, since the cards are organized in a specific sequence known to the database. In contrast, claim 1 recites an activation method that uses the first card number in a series of cards and the total number of cards.

Risafi does not cure the defect in Goldstein. Risafi does not teach or suggest batch activation **at POS or ATM**. More specifically, Risafi describes, in Col. 9, ll. 9-18 that in batch activation, the issuer or card program sponsor 102 transmits to the processing center, a file including at least card numbers, system-assigned PINs, and initial value to be loaded and the processing center sets up a card and account file for each card number and records the associated PIN. This transmitting process of the file (also referred to a batch file by Risafi) occurs between the issuer 102 and card processing center 110, **not at terminal 106** (see Fig. 1 of Risafi).

Risafi does not teach the claimed way of **batch activation**. Conversely, Risafi describes a process where each card number is separately entered and transmitted to a prepaid debit card center (PDC) in a **batch file** that includes the card account number, the effective date, the amount to be loaded into the card account, a transaction code (i.e., "new"), and a system-assigned PIN. It is this process that is referred to as "batch activation". More specifically, Risafi describes that as compared with the "**agent**" or "**terminal**" activation depicted in Fig. 4, which activates one account at a time, more than one prepaid card account can be set up and activated at once in a process called "batch activation", which typically involves a **program sponsor** (Col. 12, ll. 20-24). Risafi describes a process where the program sponsor records the card number associated with each recipient and in step 502, assigns a personal identification number (PIN) to each card (Col. 12, ll. 20-34). Risafi further describes, in Col. 12, ll. 58-65, that in step 534, prepaid debit card center (PDC) 404 adds the card number to the Card File, along with the PIN and the value placed in the card account, and adds the card value to the Account file. **Step 534 is repeated for each card included in the batch file.** While Risafi may teach activating multiple cards at the same time, it does so **only after each card number is individually read** and transmitted in a batch file using the step 534. Such activation is **not the batch activation process** as recited in claim 1.

Risafi does not teach or suggest entering a first card number corresponding to a first card in a series of cards into said POS device and entering a total number of n cards to be activated into the POS device as recited in claim 1. Even the cards are in **sequence** as taught by Goldstein, Risafi would still **repeat** the step 534 for each card. As a result, the combined teachings of Goldstein and Risafi do not suggest to activate the cards as recited in claim 1. Hence, claim 1 is believed to be allowable over Goldstein in view of Risafi. Accordingly, each of the dependent claims is patentable by virtue of its dependence from a patentable claim. Withdrawal of the rejection is respectfully requested.

#### Claims 6-15

Claim 6 is believed to be patentable over Goldstein in view of Risafi for at least the reasons given above with respect to claim 1. Accordingly, each of the dependent claims is

patentable by virtue of its dependence from a patentable claim. Withdrawal of the rejection is respectfully requested.

Claims 16-22

Claim 16, 21, and 22 are believed to be patentable over Goldstein in view of Risafi for at least the reasons given above with respect to claim 1.

Accordingly, each of the dependent claims is patentable by virtue of its dependence from a patentable claim. Withdrawal of the rejection is respectfully requested.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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